**MEMORANDUM ENDORSED**

MURIEL GOODE-TRUFANT
Acting Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
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NEW YORK, N.Y. 10007

BRYN RITCHIE
Assistant Corporation Counsel
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August 22, 2024

VIA E.C.F.

Honorable Gregory H. Woods
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Moments v. Warden Ada Pressley et al.
1:24-cv-01865-GHW-GS

Your Honor:

I am an Assistant Corporation Counsel in the New York City Law Department and the attorney representing defendant the City of New York in this matter. Defendants write to respectfully request that the Court afford Defendants an additional two weeks to reply to Plaintiff's opposition papers. This is Defendants' first request for an extension of time to respond to the Complaint. Due to Plaintiff's incarcerated status, I was unable to obtain their position on the instant request.

By way of relevant background, Plaintiff filed the Complaint on March 11, 2024. A waiver of service was returned unexecuted as to Warden Ada Pressly on June 13, 2024 stating that she is no longer an employee of the agency. A waiver of service was returned executed as to the City of New York on June 24, 2024.

Additional time is required to properly address Plaintiff's arguments in the initial complaint. Defendants intend to submit a fully dispositive motion to dismiss and request the additional fourteen days to more fully investigate Plaintiff's claims. The requested extension of time will also afford this Office an opportunity to receive and review the relevant documentation concerning Plaintiff's allegations. Accordingly, we respectfully request that the Court extend the time for Defendants to submit its motion to dismiss from August 23, 2024, to September 6, 2024.

Defendants thank the Court for its time and consideration herein.

Respectfully submitted,

Bryn M. Ritchie /s/

Bryn M. Ritchie
Assistant Corporation Counsel
General Litigation Division

CC: VIA FIRST-CLASS MAIL
Betta Moments
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RMSC Rikers Island
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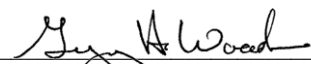
Application denied without prejudice. Defendants' application for an extension of time to answer or otherwise respond to the complaint, Dkt. No. 13, is denied without prejudice.

Defendants are reminded that the Court has referred this case to Magistrate Judge Gary Stein for all General Pretrial Matters and all Dispositive Motions, including motions to dismiss. Dkt. No. 9. Defendants are instructed to direct all submissions subject to the Court's referral order to Judge Stein. Defendants should not expect Judge Woods to respond to referred matters in this case.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 13.

SO ORDERED.

Dated: August 22, 2024
New York, New York



GREGORY H. WOODS
United States District Judge